

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 03 30298 MAP

JAMES TULGAN,
Plaintiff

v.

BERKSHIRE ARMORED CAR
SERVICES CO., INC. PROFIT SHARING
PLAN, BERKSHIRE ARMORED CAR
SERVICES CO., INC., GERARD S.
REDER AND JACQUELINE POWERS

Defendants

JOINT STATEMENT CONCERNING
PRETRIAL SCHEDULE

FILED
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MAR 19 P 3:34
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

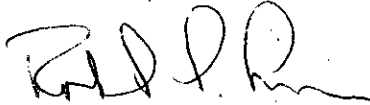
The plaintiff and all the defendants except Jacqueline Powers are represented by attorneys. Ms. Powers has filed a pro se answer. Ms. Powers has been sent a copy of this Joint Statement and asked to submit in writing to both attorneys her desires concerning the matters covered by this statement.

The plaintiff and defendants represented by Attorney Houghton state and propose the following:

1. That discovery not be phased and that all discovery be completed within six months of the scheduling conference;
2. All motions to be filed within 30 days after the close of discovery with responses due within 30 days after service of the motion on the parties.

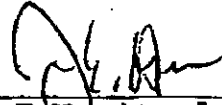
3. Attached hereto are certifications of consultation between counsel and client concerning litigation costs and settlement alternatives.

The Plaintiff



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The Defendants,
Berkshire Armored Car Services
Co., Inc. Profit Sharing Plan,
Berkshire Armored Car Services
Co., Inc. and
Gerard S. Redcor



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